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Exhibits

1. 0 Introduction

1.1 Office Functions

The Office of Analytical Services and Quality Assurance (OASQA) provides centralized analytical services and quality assurance support for Region III. The Client Services Team (CST) serves as a broker of analytical and technical services for the Regional programs and assists field personnel with the procedures for packaging, shipping, and documenting environmental sampling events. These analytical services are tied in with Quality Assurance Project Plans (QAPP) which are part of our mandatory Agency-wide Quality System. The QAPP is used as a tool by project managers and planners to document the type and quality of data needed for environmental decisions and are used to blueprint the collection and assessment of data for all Agency environmental programs. EPA Order 5360.1 requires development of QAPP and data quality objectives prior to sampling and analysis. As new sites are discovered or old site QAPPs are revised, please enter QAPP and /or SAP information on the form provided (Exhibit 17) and submit them to Client Services Team.

1.2 Analytical Services Mechanisms

The Client Services Team coordinates and manages the acquisition of analytical services through the following mechanisms:

Regional Program/Division	Service Description	Mechanisms Used
Superfund	Routine Analytical Services RAS - Fixed price routine analytical services	Contract Laboratory Program (CLP) OASQA Lab
Superfund	Delivery of Analytical Services DAS - analytical services needed by Superfund that are not available from the CLP	OASQA Lab Bank Card Procurements Small purchase Contracts Field Contractors or IAGs
WCMD **WPD** **OECEJ** **APD** **CID** **ESD** **Other**	Non-Superfund NSF - analytical services provided to the non-Superfund programs of Region III	OASQA Lab Bank Card Procurements Small Purchase Contracts Buy-in to Contract Laboratory Program or ESAT

1.3 Analytical Services Contact List

Service	Primary Contact	Secondary Contact
Superfund Contract Laboratory Program (CLP)		
Regional Sample Control Center (RSCC)	B. Jeffery	D. Slizys
RAS Scheduling Coordinator	B. Jeffery	D. Slizys
RAS Problem Resolution & Letters	D. Slizys	B. Jeffery
Data Package/Mail Receiving	D. Slizys	B. Jeffery
RSCC Database Tracking	B. Jeffery	J. Snyder (ESAT)
Request for Paperwork/Tags	J. Snyder (ESAT)	B. Jeffery
FORMS II LITE	D. Slizys	B. Jeffery
CST Database	J. Kwedar	B. Jeffery
CLP Project Officer (CLP PO)	D. Slizys	K. Thaung
RAS Rejection/Reduced Invoice Payment	D. Slizys	K. Thaung/R Donovan
RAS CLP PE Requests	D. Slizys	K. Thaung
CLP Sample Projections	D. Slizys	B. Jeffery
RAS CSF Evidence Audit	B. Jeffery	D. Slizys
CLASS Contract Coordinators	Holly Rogers (CLASS)	Sean Kolb (CLASS)
Superfund Delivery of Analytical Services (DAS)		
DAS Project Officer	K. Thaung	D. Slizys
DAS Scheduling Coordinator	J. Kwedar	K. Thaung
DAS Problem Resolution & Letters	K. Thaung	J. Kwedar
DAS Rejection/Reduced Invoice Payment	K. Thaung	J. Kwedar
DAS PE Request	K. Thaung	D. Slizys
DAS Bid Solicitations	K. Thaung	J. Kwedar/R. Donovan
DAS Invoice Inventory	M. Mehr	K. Thaung/J. Kwedar
DAS CSF Evidence Audit	K. Thaung	J. Kwedar
DAS Bank Card Procurements (<$2,500.00)	R. Donovan	B. Jeffery
DAS Procurements (>$2,500 to $25,000.00)	R. Donovan	S. Ozer (CO)
DAS Procurements (>$25,000.00)	S. Ozer (CO)	
Non-CLP Data Tracking (ANSETS)	Willie Wong (AOC)	D. Slizys
Non-Superfund (NSF) Analytical Services		
Non-Superfund Scheduling Coordinator	K. Thaung	J. Kwedar
Non-Superfund Problem Resolution	K. Thaung	J. Kwedar
OASQA Laboratory Sample Coordinator	P. Sosinski	C. Harris/T. Reppert

Contact Information

Client Services Team

Ruth Ann Donovan	**(410) 305-2662**	**donovan.ruthann@epa.gov**
B.A. Jeffery	**(410) 305-2601**	**jeffery.betty@epa.gov**
John Kwedar	**(410) 305-3021**	**kwedar.john@epa.gov**
Marcie Mehr	**(410) 305-2678**	**mehr.marcie@epa.gov**
Diane Ogden	**(410) 305-2737**	**ogden.diane@epa.gov**
Daniel Slizys	**(410) 305-2734**	**slizys.dan@epa.gov**
Khin Cho Thaung	**(410) 305-2743**	**thaung.khin-cho@epa.gov**
FAX #:	**(410) 573-3095**	
E-mail	**EPA Agency LAN**	**R3 Clients@epa.gov**

OASQA Laboratory

Pat Sosinski	**(410) 305-2667**	**sosinski.pat@epa.gov**
Carroll Harris	**(410) 305-2625**	**harris.carroll@epa.gov**
Tom Reppert	**(410) 305-2613**	**reppert.tom@epa.gov**

Regional Contracting Officer

Sidney Ozer	**(215) 814-5305**	**ozer.sidney@epa.gov**

CLP Contractor Support

Holly Rogers (CLASS)	**(703) 264-9526**	**holly.rogers@dyncorp.com**
Sean Kolb (CLASS)	**(703) 717-4403**	**klobs@dyncorp.com**
Judy Snyder (ESAT)	**(410) 305-3015**	**snyder.judy@epa.gov**

EPA Analytical Operations Center (AOC)

Willie Wong	**(703) 603-8846**	**wong.willie@epa.gov**

2.0 Analytical Services Brokerage

2.1 Overview of Superfund Contract Laboratory Program (CLP) Routine Analytical Services (RAS)

The Superfund Contract Laboratory Program (CLP) is a national contract mechanism for obtaining analytical services to assess hazardous waste sites. The CLP provides analytical support for Superfund related field activities, including preliminary site inspections, remedial activities, monitoring, enforcement and removal actions. Services are available to analyze water and soil/sediment samples to determine organic and inorganic contaminants.

The CLP is centrally managed by the Analytical Operations Center (AOC) within the Office of Emergency and Remedial Response. Contract Laboratory Program Project Officers (CLP Pos)

monitor the performance of CLP laboratories and provide technical support.

Regions schedule CLP samples through their Regional Sample Control Center (RSCC), which coordinates with AOC's contractor identified as Contract Laboratory Analytical Support Services (CLASS). The CLASS contractor provides management, operation, and administrative support to the CLP. The CLASS contractor routinely receives Regional analytical requests, coordinates and schedules sample analyses, and tracks sample shipments.

2.1.1 Available CLP RAS Contracts Statements of Work (SOW)

CLP SOW OLM04.2 Organic Analysis: Multi-Media, Multi-Concentration offers 7, 14, and 21 day turnaround times (TAT) with preliminary results (PR) available for Volatiles in 48 hours, for Semivolatiles and Pesticides/PCBs in 72 hours. Electronic diskette deliverable is required.

CLP SOW OLC03.2 Organic Analysis: Low Concentration drinking water levels offers 7, 14 and 21day turnaround. Diskette deliverable is required.

CLP SOW ILM04.1 Inorganic Analysis: Multi-Media, Multi-Concentration offers 7, 14, and 21 day turnaround times with preliminary results available in 72 hours for all TATs. Agency standard diskette deliverable is required.

The most current CLP SOWs are available on the Internet at the following web site -- http://www.epa.gov/oerrpage/superfund/program/clp/methods.htm

2.2 Overview of Superfund Delivery of Analytical Services (DAS)

The DAS program provides Superfund with specialized analyses which are not available through the CLP. A combination of the OASQA Lab and procurement of services from commercial labs comprise the process. All DAS acquisitions are established and managed by EPA Region III. A team of Region III Contracting Officers and OASQA/CST Project Officers manage the program.

The matrices and target analytes provided through DAS are extremely varied. Matrices range from sludge, air, tissues, and individualized site wastes. Analytes can be anything from common metals to proprietary compounds for which there is very little historical data. DAS uses a wide variety of analytical services sources to fulfill customer's special needs.

2.2.1 Available DAS Mechanisms

OASQA Lab -- high quality, flexible services for a wide range of analyses

Bank Card Purchases and Purchase Order Procurements

Field Contractors

2.3 Overview of Regional Non-Superfund Services (NSF) Mechanisms

The following mechanisms for analytical services are available for all Regional programs:

OASQA Laboratory

Bank Card Purchases and Purchase Order Procurements

Contract Laboratory Program (CLP) or ESAT buy-in

2.3.1 Office of Analytical Services and Quality Assurance (OASQA) Laboratory

High quality, flexible services are available from the OASQA Lab. The Lab provides analytical support to all Region III programs, both Superfund and non-Superfund. Analytical results received are fully validated. Requests for OASQA Lab analytical services are submitted to the Client Services Team, who will coordinate with the OASQA Lab to schedule analyses. Once the OASQA Lab accepts a request, the OASQA Lab Sample Coordinator notifies the requester and arranges the analysis. The Sample Submission Guidelines (attached) specify sampling requirements, including sample volumes, Quality Control samples, and paperwork requirements.

2.4 Procedures for Requesting/Scheduling RAS, DAS and NSF Analytical Services

Region III field personnel or program personnel are responsible for initiating and submitting analytical requests. The intent of this guidance is to assist Region III project managers, site leaders and field personnel in the preparation and submittal of requests for the Superfund Contract Laboratory Program's Routine Analytical Services (RAS), Superfund Delivery of Analytical Services (DAS), and non-Superfund (NSF) analytical services. The Client Services Team (CST) secures lab space, notifies customers of lab assignments, receives and provides shipping information, and assists in problem resolutions.

2.4.1 Procedures for Requesting/Scheduling CLP RAS and DAS Analytical Services

For Superfund CLP RAS and DAS requests, the process begins with the sampler preparing an analytical services request by creating an electronic data file. If an EPA or other contractor prepared the request, it is submitted in electronic format to the Regional Project Manager (RPM) or On Scene Coordinator (OSC) for approval. The RPM, or OSC will e-mail the request at least 4 weeks prior to the sampling event to the Client Services Team at email group **"R3 Clients"**.

You will not be able to view the analytical request data file in Lotus Notes e-mail. You will have to save and view it in WordPerfect. We use WordPerfect (WP) merge feature to create our analytical forms.

These are steps you could follow:

1. Save and view data file in **WordPerfect**
2. Open the **Analytical Data File** that the field contractor provided to you.

3. A new Merge Toolbar will appear on your screen. Select **"MERGE"**
4. A Perform Merge display will appear on your screen with an open window requesting **"FORM DOCUMENT"**
5. Click the button on the right side of the open window and retrieve the form file **" 2K2REQForm.frm"** from where you saved it
6. The **"DATA SOURCE"** window will contain your **"Analytical Data File"** that the field contractor provided to you.
7. Perform the merge function by clicking **"MERGE"** button on the Perform Merge Display.
8. The merged form will appear on your screen. You can save it for your record or review its contents.

If you do not need a hard copy form file record and only desire to review and edit the analytical data file, you can again save the file on a drive and open it in WordPerfect using the **quick entry** (that will appear as a merge toolbar) feature to review the file after you open it in WP.

1. Save and view data file in **WordPerfect**
2. Open the **Analytical Data File** that the field contractor provided to you.
3. A new Merge Toolbar will appear on your screen. Select **"QUICK ENTRY"**
4. A **quick entry screen** will be displayed on your screen for your review
5. Each field will be labeled so you can review or scan the data file contents
6. You can edit the data, save it and send to R3 Clients for processing

The Clients Services Team forwards the request to the OASQA Lab for consideration. If the OASQA Lab accepts the request, the OASQA Lab Sample Coordinator will schedule the request for analysis with the sampler. If the OASQA Lab declines the request, the CST performs a technical review of the request and determines which analytical service would be most cost effective to provide the quality of data required for the decisions being made. If the selected service is RAS, the CST will coordinate with CLASS and

provide the lab assignment to the field contractor. If the selected service is DAS, the CST will assign a DAS number, apply technical specifications to the request, solicit requests for bids, schedule analytical services with commercial laboratories for awards less than $25,000.00 and notify the sampler where to ship the samples. For analytical requests which are greater than $25,000.00, the CST will prepare a solicitation file and provide it to the Regional Contracting Officer in the Regional Office in Philadelphia for solicitation and award. The Regional Contracting Officer will notify the field contractors which laboratory was awarded the contract and provide shipping information.

2.4.2 Procedures for Requesting/Scheduling NSF Analytical Services

If the request is for non-Superfund (NSF) analytical services, the sampler prepares an electronic data file and e-mails the request at least 4 weeks prior to the sampling event to the Client Services Team at email group **"clients"** or **"R3 Clients"**.

The Clients Services Team forwards the request to the OASQA Lab for consideration. If the OASQA Lab accepts the request, the OASQA Lab Sample Coordinator will schedule the request for analysis with the sampler. If the OASQA Lab declines the request, The CST will assign a NSF number, apply technical specifications to the request and solicit requests for bids. If the bids are less than $25,000.00, the CST will contact the program officials to receive funding information so that commercial lab services can be procured and samples scheduled. For bids greater than $25,000.00, the CST will prepare a solicitation file and provide it to the Regional Contracting Officer in the Regional Office in Philadelphia for solicitation and award. The Regional Contracting Officer will contact the program officials to arrange funding for the analytical services. The Regional Contracting Officer will notify the sampler which laboratory is awarded the contract and provide shipping information.

2.5 Analytical Request Data File Creation

Region III uses WordPerfect 6.1 or higher versions to create request data files. The preparer creates the data file by entering data into the Quick Data Entry Screen. Only pertinent data needs to be entered into the Quick Data Entry Screen.

The preparer must have the following files to create a request data file:

2K2NINSTRCT-- instruction file.
2K2DATA -- data file for data entry

NOTE: The **2K2DATA** file is a template file which will be used by the preparer to develop analytical requests for RAS, DAS and NSF analytical services. The template file is available by contacting Dan Slizys at email slizys.dan@epa.gov, telephone 410-305-2734.

PROCEDURE: (See Exhibit 2)
Select WordPerfect as a word processing program. Insert the provided disk into the A: or B: drive and select **"2K2DATA"** and open the file. Select **"Quick Entry"** from the menu bar to

open the Quick Data Entry Screen. Movement among fields in the Quick Data Entry Screen is done by using the mouse, or keys located on the right side of the screen, or the ENTER key.

NOTE: The preparer fills in the fields which are in **bold print** and marked with an **asterisk (*).**

Administrative Process Fields:

RAS Case Number: assigned by RSCC/CLASS
DAS Request Number: assigned by RPOC
NSF Request number: assigned by CST coordinator
Date: entered by CST upon receipt of request for review
***Data Validation Level:**
Organic validation levels: M1, M2, & M3(highest level)
Inorganic validation levels: IM1, & IM2(highest level)
EPA Lab Reply: filled in by Analytical Team

Site Specific Information Fields:

***Site: Use the NPL listed SITE name**
***QAPP/SAP Info: write YES if plans exist and NO if plans do not exist**
***Address:**
***City:**
***State: Use the Post Office two letter codes**
***Latitude:**
***Longitude:**
***Analysis + Data Validation TAT: This is the total time required in days which includes analysis and data validation.**
***Program: Superfund, RCRA, NPDES, TSCA, etc...**
***CERCLIS Number:**
***Activity: SI, RI/FS, Removal, etc...**
***Account Number: Example - (00T03NFAX03M1RD02)**
Superfund Account numbers are provided by RPMs or OSCs
Non-Superfund PRC numbers are provided by program officials (Exhibit 17)
Operable Unit: assigned by RSCC coordinator
Spill ID: assigned by RSCC Coordinator

Site Specific Points Of Contact Fields:

***Preparer:**
***Preparer's telephone number:**
***Preparer's FAX number:**
***Preparer's E-mail:**
*** RPM/PO:**
***RPM/PO's telephone number:**
***RPM/PO's Fax Number:**
***RPM/PO's E-mail:**
***Site Leader: (field contractor)**
***Site Leader's telephone number:**

***Site Leader's FAX number:**
***Site Leader's E-mail:**

Site Specific Contractor Identification Fields:

***Contracting Officer: (CO for field Contractor)**
***Contract type: RACS, SATA, ROCS, etc...**
***Prime: Name of Prime Contractor**
***Sub: Name of Subcontractor**

Shipment Information Fields:

Lab Assignment Date: RAS assigned by CLASS; DAS assigned by CST
Organic Lab: RAS assigned by CLASS; DAS assigned by CST
Inorganic Lab: RAS assigned by CLASS; DAS assigned by CST
***Analytical TAT: Turnaround Time in Calendar Days for Analysis only**
***Ship Date From:**
***Ship Date To:**
***Carrier: Identify the carrier**

Sample & Analytical Information Fields:

***Number of Samples** Column: Includes field QC samples plus environmental samples. Do not include lab QC samples
***Method** Column: Identify methods selected in the approved project plan or permits
***Parameter** Column: Identify specific analytes or compounds of interest
***Matrix** Column: Select the most specific matrix of samples by using the codes below:

AQ	water samples
DW	drinking water samples
GW	ground water samples
WW	waste water
DIS	dissolved fraction of water samples
SOLID	other solid samples
SOIL	soil samples
SEDIMENT	sediment samples
SLUDGE	sludge samples
FISH	fish tissue
ANIMAL	animal tissue
SHELLFISH	shellfish tissue
PLANT	plant tissue
PET	petroleum products
NPET	non petroleum organic products
OIL	oil
TAR	tar
AIR	air
WIPES	wipes
DUST	dust
ASH	ash
LEACH	leachates

***Special Instructions:** This is an open text box where special instructions are written such as faxing FORM Is to specific people, or unique procedures for sample preparation, etc...
*** Superfund Project Plan Reporting Limits:** This is an open text box for providing specific quantitation limits addressed in the Quality Assurance Project Plan (QAPP).
***Non-Superfrund Permit Reporting Limits** -- Indicate the quatitation limits/permit limits that are required to satisfy the objectives of the sampling event.
***Data Quality Objectives-Precision and Accuracy** -- Provide QC limits for accuracy (spike recoveries) and precision.

After the preparer completes the entry of all pertinent data, select **"Close"** to exit the **Quick Entry Screen.** Respond **"no"** to save to disk. Select **"File"** from the WP menu bar and **"save as".** Save the data file under a **different file name. Send RAS and DAS data files by e-mail to the RPM or OSC** for approval with a courtesy copy sent to the **Client Services Team**. Send **NSF** data files to the Client Services Team at email group **"R3 clients"**.

2.6 Data Validation Process

This section provides an overview of the Superfund RAS and DAS data validation process in Region III. All Superfund analytical results produced by CLP laboratories or other contract labs must be validated. The data validation functions are performed by the Region III ESAT data review team. All data packages received by OASQA's RSCC office are transferred directly to ESAT for processing.

NOTE: Analytical results (both Superfund and non-Superfund) produced by the OASQA Lab or ESAT are validated in house by the OASQA Lab Analytical Team. Analytical results produced by a commercial lab for a NSF request **are not validated**, unless the project manager requests and arranges for validation by an independent organization.

The data validation turn-around time is based on the data review levels which in turn are based on the Functional Guidelines. The Regional Project Manager is responsible for determining the appropriate level of review. The approximate turn-around time (TAT) for each data review level is listed below.

Organic Data Validation:

Review Levels	TAT
M1, detected compounds only	<30 days
M2, quantitative assessment of data quality, false negatives, and detection limits	<30 days
M3, full Functional Guidelines Data Evaluation	30 days

Inorganic Data Validation:

Review Levels	TAT
IM1, similar to M2	<30 days
IM2, full Functional Guidelines Data Evaluation	30 days

3.0 Field and Shipping Documentation

3.1 Required Paperwork for RAS, DAS, and NSF

Each analytical service has specific paperwork requirements. These paperwork requirements are summarized below. The Client Services Team will inform the customer which service was procured for analytical services and what type of paperwork is required for sample submission.

NOTE: The OASQA Lab has it own paperwork requirements for both Superfund and non-Superfund analyses as specified below. Other NSF services follow the DAS paperwork requirements.

ANALYTICAL SERVICES PAPERWORK REQUIREMENTS

PAPERWORK	OASQA (SF and NSF)	DAS/Other NSF	RAS
Chain-of-Custody	**X**	**X**	**X**
Hazard /Risk Sheet	**X**	**NR**	**NR**
Sample Numbering	**NR**	**X**	**X**
Sample Label & Tags	**X**	**X**	**X**
Sample Seals	**X**	**X**	**X**
Communicate Shipping Information	**X**	**X**	**X**

X Required
NR Not required

The Regional Chain-of-Custody Form and Shipping Log Forms were combined into one Regional Chain-of-Custody Form and it was distributed for use in FY'99.

FORMS II LITE can be substituted for the Regional Chain-of-Custody Form. FORMS II LITE is an electronic windows based application which automates sampling documentation . It generates a Traffic Report/Chain-of-Custody Form, sample tags, and container labels. FORMS II LITE can be used for all Superfund analytical services -- RAS and DAS. The Regional Chain-of-Custody Form must be used for all non-Superfund analytical services. Access to FORMS II LITE software is available for downloading at this internet site: http://199.11.42.73/itg/forms2lite/index.html.

3.2 Field Log Book

Regardless of the type of analytical service provided, samplers must maintain a Log Book that documents the field activities. The information from the field logbooks becomes evidence and can be used in court. The following list is criteria for a field log book:

Use a bound notebook
Use indelible ink for entries
Field log book entries should be factual, detailed, and objective
Date and time all entries
Each individual page must be signed by the person recording the information
USEPA recommends that log book entries be reviewed. Include reviewer signature and date of review.

Examples of field log book entries:

Date and time of entry
Purpose of sampling
Name, address, and affiliation of personnel performing sampling
Name and address of the responsible party, if known
Type of sample, e.g.; sludge or wastewater
Description of sample container
Description of sample
Chemical components and concentrations, if known
Number and size of samples taken, including the corresponding sample tags numbers for each analytical fraction
Description and location of the sampling point
Date and time of sample collection
Difficulties experienced in obtaining sample
Visual references, such as maps or photographs of the sampling site. Include the film roll number, the frame number, and a written description of the picture for photographs
Field observations, such as weather conditions during sampling periods
Field measurements of the materials, e.g., conductivity, pH, temperature
Whether chain-of-custody forms have been filled out for the samples; chain-of-custody form numbers
GIS, GPS, related information (latitude and longitude) for site and each sampling location: if known
Lab name, address and date shipped

3.3 Required Paperwork for OASQA Laboratory

The following paperwork is required when submitting samples to the OASQA Laboratory (whether RAS, DAS or NSF). Detailed instructions can be found in the attached Sample Submission Guidelines.

3.3.1 Chain-of-Custody (see Exhibit 4)

A EPA Chain-of-Custody form must be completed and must accompany each sample shipment. See Sample Submission Guidelines - Sample Identification.

3.3.2 Sample Numbering

The OASQA Lab does not have a specified sample numbering system. Samplers should use their own identification system for sample numbering. See Sample Submission Guidelines - Sample Identification.

3.3.3 Sample Labeling and Tags (see Exhibit 10)

Each sample container must have a sample label and tag. The information on the sample label and tag must be written with indelible (water proof) ink and must match the information on the Chain-of-Custody form. See Sample Submission Guidelines - Sample Identification.

3.3.4 EPA Custody Seals (see Exhibit 11)

The sample shipping coolers must be sealed with strapping tape and EPA custody seals on the outside. The custody seal must be placed so that it will be broken when the cooler is opened. See Sample Submission Guidelines - Shipping Requirements.

3.3.5 Communicating Shipping Information

Shipping information for the OASQA Lab should be communicated directly to the OASQA Lab Sample Coordinator. The Client Services Team (CST) should be informed for samples shipped to commercial labs.

3.4 Required Paperwork for DAS

USE ONLY EPA Chain-of-Custody Records, EPA Sample Tags, and EPA Custody Seals (on the sample coolers) for all DAS cases. **DO NOT USE** Contract Laboratory Program (CLP) forms and pre-printed sample numbers for DAS cases. Contact ESAT for copies of required DAS paperwork.

3.4.1 Chain-of-Custody (see Exhibit 4)

An EPA Chain-of-Custody (COC) form is required for DAS shipments and must accompany each sample shipment. Any sample shipment supplied without a COC form will be rejected. The COC form is sealed in a zip-lock bag and placed in the ice chest with the samples. All entries must be made using indelible ink. All errors and corrections are made by crossing the error with a single line and initialing.

Chain-of Custody documentation must include:

1. Site Name (Project Name) code*
2. Printed and Signed Name of Sampler
3. Date and Time of Collection in Military Time
4. Sample Description
5. Parameters Requested
6. Type of Sample (Grab or Composite)
7. Number of Containers
8. Station Number
9. Date, Time and Signatures for Sample Receipt and Transfer

***DO NOT LIST** the site name, property name, property owner's name, or any other information that could link the site to a potentially responsible party on the EPA Chain-of-Custody form. This is a precaution against any potential conflict of interest at the laboratory. Site initials are acceptable as a substitute for the site name block on the Chain-of-Custody form. For station locations, any alphanumeric combinations may be used.

Send a photocopy of the EPA Chain-of-Custody form within 3 days of sample shipment from the field to:

RSCC Coordinator
USEPA Region III OASQA
Environmental Science Center
701 Mapes Road
Fort Meade, MD 20755-5350

3.4.2 Delivery of Analytical Services (DAS) Sample Numbering

DAS requests are assigned a DAS Request Number by the DAS Scheduling Coordinator. All DAS Request Numbers are expressed as follows: **R3XXX**.

DAS organic and inorganic sample identification numbers consist of (7) characters (R3XXX00). The DAS Request Number (R3XXX) is the beginning of the DAS sample identification number. The last two characters are assigned by the sampler to create a unique sample identification number. The last two characters in the identification number can be expressed in any numeric or alphanumeric combination. A filtered sample

must be assigned a distinct and separate number. Preprinted sample labels will not be provided for DAS samples.

Example of DAS Sample Identification Number:
DAS Request Number is: R3222
DAS Sample Identification Number is: R3222**01** (where 01 is sample identifier)

Sample numbers are recorded on the EPA Region III Chain-of-Custody form.

3.4.3 Sample Tags (see Exhibit 10)

NEIC recommends the use of samples tags to identify samples. Each sample portion collected at a hazardous waste site, which is sent to a laboratory for analysis, must be identified with a sample tag. Sample tags are tied on each sample container. All sample tags are returned to the Region by the laboratory along with the corresponding data package as physical evidence of sample receipt and analysis. Each sample container label must be legibly written with indelible ink. The information on the label must match the sample tag and the Chain-of-Custody form to complete documentation of the sample.

Sample Tag Instructions:

Step 01: **Remarks**, record DAS Sample Identification Number
Step 02: **Project Code**, record DAS Request Number
Step 03. **Station No.** , record assigned station number
Step 04: **Mo./Day/year,** record date of sample collection
Step 05: **Time**, record military time of sample collection
Step 06: **Designate**, place an "X" to indicate grab or composite
Step 07: **Station Location**, record specific station location as per project plan
Step 08: **Sampler**, sign the tag
Step 09: **Preservative**, place an "X" in (Y) box or (N) in box to show if preservative was used
Step 10: **Analyses**, place an "X" next to parameter to be analyzed
Step 11: **Lab Sample No.,** leave the box blank

3.4.4 EPA Custody Seals (see Exhibit 11)

Custody seals are placed across the cooler opening after the cooler has been properly secured. The custody seal must be placed so that it will be broken when the chest is opened. The purpose of the custody seal is to indicate that samples were not tampered with during shipment. Custody seals must be signed and dated by cooler packers.

3.4.5 Communicating Shipping Information

Shipping information for DAS cases should be called in daily to the DAS Scheduling Coordinator. Please provide the following when calling in shipping information:

1. Your name, affiliation, and a phone number where you can be reached

2. The site name
3. The DAS Request Number
4. The name of the laboratory(ies) samples were shipped to and the date of the shipment(s)
5. The name of the carrier and time frame for arrival at the lab (e.g., Federal Express-Priority Overnight service)
6. The air bill number(s) and number of coolers per air bill
7. Whether or not shipping is complete for the case. If not, the date of your next planned shipment

Information for **SATURDAY DELIVERIES** must be phoned in to the DAS Scheduling Coordinator by 3:00 p.m. on Friday so that the laboratory may be notified.

DO NOT CALL CLASS WITH SHIPPING INFORMATION FOR DAS CASES!

FORMS II LITE can be substituted for the EPA Chain-of-Custody Form. FORMS II LITE is an electronic windows based application which automates sampling documentation . It generates a Traffic Report/Chain-of-Custody Form, sample tags, and container labels. FORMS II LITE can be used for all Superfund analytical services--RAS and DAS. The EPA Chain-of-Custody Form must be used for all non-Superfund analytical services. Access to FORMS II LITE software is available for downloading at this internet site: http://199.11.42.73/itg/forms2lite/index.html.

3.5 Required Paperwork for CLP RAS (see Exhibits 5, 6, 7, and 8)

Following is an overview on documenting samples prior to shipping them to CLP laboratories. Contact the ESAT for CLP paperwork.

3.5.1 CLP Traffic Report/Chain-of-Custody (see Exhibit 9)

CLP forms are for use with CLP samples only. (Memo, Aug 16, 1993)
Each form consists of four copies. Press hard when completing the form.
Distribution information is printed in the lower left-hand corner. Copies are color-coded.
The top copy is sent to the RSCC, the second copy is sent to CLASS, and the bottom 2 copies are sent with the samples to the lab.
Remember to make a photocopy of the completed form for your files.
To avoid potential conflict of interest with CLP labs, the site name and location information do not transfer to the lab copies.
Entries made in the “Regional Information” do not transfer to the lab copies.
CLASS uses the “field QC” column for CARD database entry. Environmental samples **must** be designated by a dash (-) in the column.
Data validators depend on the accuracy of the “Field QC” information contained in CARD when using CADRE to validate the data.
The “MS/MSD” is considered lab QC: **not** field QC. **Do not** enter MS/MSD

information in the column used to designate field QC.
The Organic Low Concentration Water SOW (OLC03.2) **does not** require MS/MSDs. No extra volume or designation of a lab QC sample is required. Remember dissolved (field filtered) metals aliquot must be given a separate CLP sample number from total (unfiltered) metals aliquot.

Send a photocopy of the EPA Chain-of-Custody Record within 3 days of sample shipment from the field to CLASS and to the RSCC:

CLASS
DynCorp I&ET, Inc.
2000 Edmund Halley Drive
Reston, VA 20191-3436

RSCC Coordinator
USEPA Region III OASQA
Environmental Science Center
701 Mapes Road
Fort Meade, MD 20755-5350

3.5.2 CLP RAS Sample Numbering and Labeling

The CLP generates unique Sample Numbers that must be assigned to each organic and inorganic sample. The CLP Sample Numbers are printed on adhesive labels and distributed by ESAT when requested by field personnel. It is the sampler's responsibility to assign this critical Sample Number correctly and to transcribe it accurately on the traffic report.

Organic Sample Numbers are in the format CXXXX, (five characters), and have ten labels per strip: four for Extractables, two for Volatiles and four extra.

Inorganic Sample Numbers are in the format MCXXXX, (six characters), and have seven labels per strip: two for Total Metals, two for Cyanide and three extra. Remember dissolved (field filtered) metals aliquots MUST be given a separate CLP Sample Number from total (unfiltered) metals aliquots.

Use only the labels provided by the Region in which you are sampling. Remember that the unique Sample Number must be used only once. DESTROY THE UNUSED LABELS to prevent duplication of sample numbers.

3.5.3 Sample Tags (see Exhibit 10)

A sample tag must be completed for and attached to each separate sample container, i.e., if two or more VOA vials are submitted for a single sample station location, each vial must have its own individual sample tag. Sample tags are controlled documents with serialized numbers and each individual sampler is accountable for every sample tag that is assigned to them.

All lost, voided or damaged tags must be retained in the appropriate file EXCEPT those

sample tags that were contaminated with a hazardous substance. Tags contaminated with a hazardous substance must be disposed of properly, along with any other hazardous waste from the site. However, these contaminated sample tags must also be documented in the field logbook and reported to the site leader. Make sure that voided or damaged tag numbers are deleted from the chain-of-custody form before sending it to the laboratory.

3.5.4 EPA Custody Seals (see Exhibit 11)

The purpose of the custody seal is to indicate that samples were not tampered with during shipment. At least two custody seals must be placed across cooler openings so that when the cooler is opened the seals will be broken. Custody seals must be signed and dated by the cooler packers. Coolers must also be sealed with strapping tape in such a manner that the cooler cannot be opened without cutting through the tape.

There is no substitution for custody seals. A handwritten facsimile is not acceptable. Therefore, make sure you have enough custody seals before going to the field.

USEPA's National Enforcement Investigation Center (NEIC) requires placement of the custody seals on the cooler only. Custody seals are not required on the lids of the sample containers. The glue used in the adhesive of the tape may contaminate the sample. This is especially true of VOA vials where adhesive would come in contact with the septum.

3.5.5 Communicating Shipping Information

Notify the CLASS Coordinator of all CLP sample shipments. The CLASS contractor is responsible for tracking sample shipments and analyses. The following information is required:

Case Number
Name of Laboratory
Date of Shipment
Overnight Carrier (FedEx), Airbill number
Number and Matrices (Waters, Soils, etc.) of samples shipped
Information on completions, changes, delays continuations, etc.,
Sampler's name and Phone number

CLASS must be notified by 3:00 PM on Friday for samples intended for Saturday delivery

NOTE: FORMS II LITE can be substituted for the CLP Chain-of-Custody/Traffic Report Form. FORMS II LITE is an electronic windows based application which automates sampling documentation . It generates a Traffic Report/Chain-of-Custody Form, sample tags, and container labels. FORMS II LITE can be used for all Superfund analytical services--RAS and DAS. The Regional Chain-of-Custody Form must be used for all non-Superfund analytical services. Access to FORMS II LITE software is available for downloading at this internet site:

http://199.11.42.73/itg/forms2lite/index.html.

4.0 Paperwork Corrections

Shipping samples requires an enormous amount of paperwork. The key to error free paperwork is to have everything (COC, tags, labels, FedEx forms) filled out before sampling and to provide adequate time during sampling to check the paperwork. The CST will inform the sampler when there is an error or discrepancy noted by the laboratory on the paperwork. The proper procedures for correcting errors and omissions on original legal documents are provided below.

Errors and discrepancies discovered on paperwork prior to shipment of samples from the field is corrected by drawing a single line through the error and entering the correct information. Each correction must be initialed and dated.

All paperwork errors and discrepancies discovered post shipment must be corrected by a memo-to-file.

A "corrected" photocopy of the original or and "amended" record (chain-of-custody, sample tags) CANNOT be sent to the laboratory.

4.1 Memo-to-File

To correct errors or discrepancies on paperwork after the samples have been shipped to the laboratory, the sampler must write, and distribute a "memo-to-file." A memo-to-file is a business letter on company letterhead -- not a memo -- addressed to the laboratory sample custodian or other designated laboratory personnel. Include a synopsis of the error which occurred and an explanation of the information which should have been sent or the action which should have occurred. It must be in a business letter format and signed by the sampler or project manager, if the original sampler is not available. A separate memo-to-file must be written for each separate case number and laboratory involved.

Do not include the site name and location when writing a memo-to-file to contracted laboratories. Refer to the site by the case number and Region, e.g., Region III, Case 23432. For samples which are sent to the OASQA Lab, the procedures for correcting the paperwork errors is the same with the following exceptions: (1) use the site name and location since case numbers are not assigned, and (2) CLASS does not receive a copy.

Include all pertinent case information. At a minimum include:

(1) carrier used
(2) airbill number
(3) date of shipment
(4) sample number(s)
(5) sample station location
(6) time and date of sampling

(7) sample tag number(s)
(8) document number which is found on the bottom right-hand corner of the chain-of-custody record.

Upon receipt of the memo-to-file by the laboratory, it becomes part of the evidentiary file for that case.

Although there is no time limit for correction of the errors and discrepancies, the memo-to-file must be written as soon as an error is discovered.

4.1.1 RAS Memo-to-File Distribution

At least four copies of the original must be made with distribution as follows: (1) original to the laboratory, (2) copy to RSCC, (3) copy to CLASS, and (4) copy to the EPA Project Manager for the site. You may be distribute other copies, such as a copy to your company's central site files.

4.1.2 DAS Memo-to-File Distribution

At least three copies of the original must be made with distribution as follows: (1) original to the laboratory, (2) copy to RSCC, (3) copy to the EPA Project Manager for the site. You may distribute other copies, such as a copy to your company's central site files.

4.1.3 OASQA Memo-to-File

At least two copies of the original must be made with distribution as follows: (1) original to the OASQA laboratory, and (2) copy to the EPA Project Manager for the site. You may distribute other copies, such as a copy to your company's central site files. For samples which are sent to OASQA, use the site name and location since case numbers are not assigned.

5.0 SAMPLE PROJECTIONS for RAS and DAS ANALYTICAL SERVICES

The Contract Laboratory Program (CLP) needs sample analysis projections for Routine Analytical Services (RAS) quarterly so adequate laboratory capacity is reserved for the various analytical service contracts. Region III also requires quarterly projections for DAS analytical services.

Summarized quarterly projections must include a cover memorandum which lists sites that will be sampled during the next quarter. Electronic files in WordPerfect 6.1 to input summary projection data are provided upon request by the CST. There are three separate files: 1) ORGANIC RAS form, 2) INORGANIC RAS form and 3) DAS form. The ORGANIC RAS and INORGANIC RAS forms will have Statement Of Work fractions listed and their associated turn around times. The DAS form requires the preparer to fill in the parameter and the number of samples to be sampled for each month of the quarter. Do not provide individual site projections or matrix information. Unique matrix information can be submitted in the cover memorandum.

Sample Projection Reporting Due Dates :

First Quarter: August 10
Months: October, November, December

Second Quarter: November 10
Months: January, February, March

Third Quarter: February 10
Months: April, May, June

Fourth Quarter: May 10
Months: July, August, September

Quarterly projections should be e-mailed to Slizys.dan@epa.gov, telephone 410-305-2734, fax 410-305-3095.

6.0 Reporting non-CLP Acquisitions (ANSETS Exhibit 15 Form)

OSWER Directive 9240.02 implemented a tracking system to collect all non-CLP Superfund analytical services data. OSWER Directives 9240.02A and 9240.02B identified the responsible parties for the collection of non-CLP Superfund analytical services. Non-CLP analytical services refer to any Superfund services that are not acquired or generated through CLP Routine Analytical Services (RAS). Superfund activities are those which are funded by Superfund or involve work at a Superfund site. Analytical services include any analytical data generated by fixed labs, mobile labs, portable equipment, and test kit analysis. Non-CLP analytical services participating parties include Environmental Services Division (ESD) laboratories, field contractors and their subcontractors, states, other federal facilities, and potentially responsible parties (PRP).

Field contractors must complete provide monthly reports on all non-CLP analytical services (field tests, mobile lab and fixed lab) and submit in electronic format directly to Willie Wong at th EPA Analytical Operations Center (AOC). Directions for submission are on the internet address as follows: http://199.11.42.75/mirclp/index.htm.

For new work this language should be included in instructions dealing with sampling and analysis protocols provided to the party prior to field activities. For Removals, this language should be provided with the order. For RI/FS and RD/RA work, this language should be contained in the Quality Assurance Project Plan (QAPP) or in the standard operating procedure (SOP) and in the scope of work provided to the party prior to work plan development. For ongoing work, the OSC or RPM should instruct the party to report this information to the oversight assistant at least on a monthly basis.